

unresponsive, with a gunshot wound to the chest. APD responded to the location and processed the scene. APD homicide detectives located one .40 cal. casing at the scene. Detectives described the vacant apartment as being very clean, void of any trash or other signs of vagrancy, and did not observe any signs of forced entry on the doors or windows of the apartment. APD detectives checked the surrounding area for surveillance cameras; however, none could be found. Similarly, no eye witnesses could be located.

108. Gang investigators from the FBI, BOP, NMCD, and MDC sought additional information on the murder of M.M., the results of which are described in the paragraphs that follow.

109. In August 2022, CHS-1 reported M.M. was hit by the Sureños because M.M. “fucked up with the Black Hand (Eme).” CHS-1 said several Sureños were talking about the hit and that it had been conducted by “DOPEY,” and “LOBO” from the Sureños. CHS-1 said other Sureños may have helped. CHS-1 described DOPEY and LOBO, and said both men were hardcore gangsters and dope dealers. CHS-1 said these men had bodies on them (prior homicides).

110. In August 2022, CHS-2 reported M.M. was killed by the Sureños as a favor to the SNM. CHS-2 said the Sureños were used because the SNM was in disarray and did not have anyone good on the streets. CHS-2 said M.M. was from WSL and the shooters were guys that M.M. knew, thus likely New Mexican Sureños. CHS-2 did not know which Sureños did the hit, but warned there would be other SNM/Sureños murders to come. CHS-2 said the SNM and Eme had long memories.

111. In August 2022, CHS-3 reported the Sureños hit two SNM “llaveros” (key holders) in Albuquerque for not following orders to “take out the trash” (hit SNM cooperators). CHS-3 was under the impression case agents already knew about the hits. CHS-3 was tasked with finding out the names of the SNM members hit and the Sureños members involved in the hit.

112. CHS-3 subsequently reported the two dead SNM members were from the feds, but that

only one of the hits had been sanctioned – the murder of “LOONEY TOONS,” who was from WSL.<sup>19</sup> CHS-3 reported the hit was called by the Big Homies in the USP and the job was given to an Albuquerque crew of Sureños run by an Echo Park Sureño named “LOBO.” CHS-3 said LOBO was not from California, but still had a lot of respect from the homies. CHS-3 said LOBO was one of the top Sureños in Albuquerque because he had money and was moving dope with the cartel. CHS-3 did not know LOBO’s full name but described his physical features and said LOBO had previously gotten away with murdering a snitch on the west mesa of Albuquerque. CHS-3 said LOBO killed the snitch and a kid that had been with the snitch at the time. Afterward, LOBO burned the two victim’s bodies inside a vehicle. CHS-3 said LOBO beat the case because the cops screwed up the investigation.

113. I consulted other investigators and court records, and I believe the incident CHS-3 referred to is the April 10, 2012, kidnapping and murder of A.G. and A.G. State court records confirmed JESSE YOUNG, aka: “LOBO,” and two other defendants were charged (but not convicted) in that incident, Bernalillo County Case No. D-202-2012-003651. I’ve reviewed YOUNG’s jail booking photos, which indicated YOUNG had tattoos of the number “13” and the words “Echo Park” (both of which are Sureños specific tattoos).

114. I am aware SNM member A.A., who uses the alias “Boxer,” was killed in Albuquerque on November 3, 2021. I contacted APD homicide detectives and learned the following details about the shooting: On November 3, 2021, A.A. confronted a 22 year old man and the man’s pregnant girlfriend outside A.A.’s residence for unknown reasons. The man and woman attempted to depart the area in their vehicle; however, the confrontation continued in the street and the 22 year old man shot A.A. and then departed the location. The 22 year old man then called the police. Police

---

<sup>19</sup> I am aware M.M. is an SNM prison gang member and from the WSL street gang, M.M.’s Facebook page depicts several photos of M.M. claiming to be from WSL and flashing WSL hand signs.

responded to the location; however, before police arrived a group of homeless people robbed A.A. of his possessions (to include possibly a firearm) and then drug him to the side of the road and left him. The homeless people then disappeared and police arrived sometime thereafter. Homicide detectives believe the 22 year old shot A.A. in self-defense.

115. Regarding Boxer being “from the feds,” I am aware FBI agents arrested A.A. several years ago for bank robbery and he may have served some jail time with other defendants awaiting trial, before his case was subsequently dismissed (Case No. 13-MJ-0109).

116. Regarding M.M. being a fed member of the SNM, I am aware M.M. served two sentences in the BOP for firearm violations and escape (Case Nos.07-CR-01428-RGJ and 17-CR-03544-JBM, which is related to 16-CR-00210 out of the Western District of Texas).

117. In August 2022, CHS-5 provided background information on the Sureños and their relationship with the SNM and Eme. CHS-5 said the top dope sources of supply within the Sureños were LOBO and DOPEY, who distributed together. CHS-5 admitted to selling drugs for LOBO over the past few years. CHS-5 said LOBO was the primary man with the dope and DOPEY sold for LOBO and collected drug debts. CHS-5 described both men as killers and said LOBO had at least three bodies on him – one as a juvenile and the other two were rats that he killed for the Los Carnales prison gang several years ago (April 2012 incident). CHS-5 said knew LOBO’s brother to be a Los Carnales member who was serving a life sentence for killing a correctional officer (a fact I confirmed with NMCD officials).

118. In August 2022, CHS-7 reported the fed SNM members were spreading the word that all the SNM members that were in good standing should build relationships with the Sureños and “smash on sight” any SNM cooperators. If a carnal failed to hit a cooperater, then that carnal would be hit, according to CHS-7. CHS-7 said the SNM had an exhaustive greenlight list and thousands

of pages of discovery documenting who the rats were. CHS-7 said the Eme and Aryan Brotherhood (AB) prison gangs had worked together from their respective inceptions in the California prison system. CHS-7 said the AB had control over all the white boys in the state and federal systems around the country. CHS-7 said the Sureños and white boys would move on any SNM rats in the feds, or on the street if they had the chance. In turn, the SNM would have to move on enemies of the Eme and AB. CHS-7 had not heard about the murders of M.M. or A.A., but surmised if they were good carnals then they were untouchable unless the big homies (Eme or SNM leadership) authorized the hits.

119. CHS-7 said all of the Hispanic gangs in New Mexico would fall under the Eme, so it was futile to go to war with each other. CHS-7 said all of the older homies in New Mexico knew this fact and that is why none of the old school gangs were fighting anymore. CHS-7 said the only gang warfare taking place in Albuquerque now were the “youngsters who don’t know how this shit works” and the black gangs.

120. In August 2022, CHS-11 provided the following information: The SNM started after the Santa Fe riot in 1980, with the blessing of the California Eme. CHS-4 said SNM founder JUAN BACA had done time in California under an interstate compact agreement and established a relationship with the California Eme members. BACA and other New Mexico inmates had rejected the formation of the Nuestra Familia (NF) prison gang in New Mexico. The NF and the Eme were/are rival prison gangs. With the blessing of the California Eme, BACA subsequently returned to New Mexico and started recruiting members for a new prison gang. BACA and the California Eme had discussed what the New Mexico gang should be called. The gang was initially going to be called the “New Mexican Mafia,” but the California Eme thought that was confusing and did not like that name. BACA then selected “Syndicato Nuevo Mexico” and the Eme agreed.

121. CHS-11 said the federal Eme and SNM remain united, although the SNM are subservient to the Eme in the feds. CHS-11 said the SNM are equal to the Sureños and the two gangs work together to carry out the orders of the Eme, earn money, and commit violence against their individual and collective enemies.

122. CHS-11 knew A.A. and M.M. and said both were good carnals. CHS-11 said both men were always armed and had put in a lot of work for the SNM over the past 30 years. CHS-11 believed both men would be difficult to ambush or sneak up on. CHS-11 opined that if they were killed by the SNM, it would have come on orders from gang leaders. CHS-11 believed the Eme or SNM leadership in the feds called the hits and they were carried out by the Sureños because the SNM did not have any fed members on the street yet.

123. In August 2022, CHS-12 said ERIC HARRISON, aka: "SNOOP," and DAVID CHAVEZ, aka: "WACKY," would be the next to run Albuquerque, once both were released to the streets. CHS-12 said fed SNM member BERNARD BACA, aka: "MAD DOG," was to assist SNOOP and WACKY, but BERNARD BACA had been strung out on dope and needed to get clean. CHS-12 said M.M. was hit by the SNM because M.M. had failed to hit SNM cooperators or follow other orders sent down from the tabla (SNM leadership). CHS-12 maintains relationships with Sureños members and CHS-12 said several Sureños were talking about the hit and that it had been conducted by "CASPER," "LOBO," and other Sureños. The Sureños advised CHS-12 that they would be assisting the SNM in hitting cooperators. CHS-12 knew LOBO to have gotten away with a couple murders in the past and described CASPER as having a Duke City paw print on his face and having a couple of Cadillac lowriders.

124. I am aware THOMAS JARAMILLO, aka: "CASPER," owns a blue Lincoln Towncar lowrider and a silver Cadillac lowrider. His booking photos and Facebook page depict photos of

the low riders, as well as the Lobo paw below his right eye.

125. CHS-12 reported the SNM was being run by the members in the federal system and the tabla consisted of ANTHONY RAY BACA, "PUP," ARTURO GARCIA, aka: "SHOTGUN," SAMUEL SILVA, aka: "RABBS," and DANIEL SANCHEZ, aka: "DAN DAN." CHS-12 said the SNM in the state system were being run by JONATHAN GOMEZ, aka: "BABY G," and DAVID CHAVEZ, aka: "WACKY," both of whom had been to the feds. CHS-12 said M.M. and "SNOOP" (ERIC HARRISON) were in charge of the members on the street. Now that M.M. was dead, CHS-12 said SNOOP would be running the streets with DAVID CHAVEZ, aka: "WACKY," and BERNARD BACA, aka: "MAD DOG." CHS-12 said SNOOP just got out of the feds and was at the halfway house. CHS-12 said SNOOP claimed to have welas (coded letters) from the table and an updated greenlight list.

126. CHS-14 reported M.M. was hit by the Sureños on orders from the "Big S," which CHS-14 said were the SNM leaders in the feds. CHS-14 did not know which Sureños members hit M.M. CHS-14 said all of the cooperators would be hit eventually and the jobs would be outsourced to the Sureños and AB.

#### **Drug Distribution in Furtherance of the SNM/Sureños Criminal Enterprises**

127. The SNM and Sureños have historically generated income by distributing controlled substances, extorting weaker drug dealers, and participating in drug related robberies and burglaries. Although the SNM and Sureños are separate organizations, the two gangs operate in subgroups on the streets and in county jails. In federal prison, the SNM and Sureños (and all Hispanic New Mexico gangs) band together under the Eme.

128. Although there are different subgroups in the jails and on the streets, the method of operation remains the same. Incarcerated members are expected to create opportunities to smuggle

drugs and contraband cell phones into the facilities, and manufacture weapons. A portion of drugs and/or drug proceeds are shared with other SNM/Sureños members. Drugs are sold to the larger inmate population within the prison(s), and fellow SNM/Sureños members are expected to band together to ensure payment for drugs is collected. In some cases, where the SNM/Sureños controlled a prison, or section of the prison, other inmates are taxed on their sales of narcotics. The same methods are utilized in SNM/Sureños dominated neighborhoods in New Mexico, where smaller drug dealers are taxed by governing SNM/Sureños members. SNM/Sureños members on the street exercise more autonomy from gang leaders, but are expected to take care of SNM/Sureños business and share drugs or proceeds with their incarcerated brothers. SNM/Sureños members work together to manage non- SNM/Sureños drug dealers on the street and within prison walls, to include: the demand for payment of tributes or taxes, the assurance of protection and support in exchange for payment, and the threat of or use of violence if payment was not made.

129. I believe the operation of different SNM/Sureños groups in different areas of the state, and in federal prisons, do not contradict the existence of a single conspiracy. I believe the activities of the SNM/Sureños members are coordinated, so as to ensure the group supports the plans and proclamations in the best interest of the whole group. For example, SNM/Sureños leaders must coordinate to ensure no two groups were taxing the same drug dealer. I am aware SNM/Sureños leaders manage the operations of their subordinates, to include: (1) consistent methods for smuggling drugs into prison, (2) an established system for the distribution and sale of drugs once inside a facility, (3) which involved the standard tribute given to SNM/Sureños members, (4) the advertisement of drugs for sale, (5) the method of payment, and (6) the threat of violence for nonpayment.

130. For each of the activities described herein, I believe there is probable cause to believe

SNM/Sureños members and associates knew of the activities of others within the group, and the drug distribution schemes were heavily dependent on the reputation and strength of the SNM/Sureños falling under the umbrella of a larger organization. Moreover, each scheme was intended to benefit all members and associates within the enterprise.

131. In the paragraphs that follow, I have provided details related to an on-going conspiracy to distribute controlled substances in furtherance of the SNM/Sureños and WSL enterprises.

#### **Distribution on the Street**

132. In August 2022, CHS-3 reported JESSE YOUNG, aka: “LOBO,” and his crew were the top Sureños methamphetamine and fentanyl dealers in Albuquerque. CHS-3 knew YOUNG to supply Sureños members in Oklahoma and Denver, Colorado. CHS-3 used to order drugs from some of the same people sourcing YOUNG and said the suppliers were from the Sinaloa Cartel.

133. In August 2022, CHS-4 reported the number of Sureños in Albuquerque had been increasing in recent years, particularly with Sureños coming out of the feds. CHS-4 said a lot of California Sureños were not returning to California due to tougher laws there, the cost of living, and the fact that New Mexico was an “easy place to live... and be us (Sureños).” CHS-4 said all the Hispanic gang’s ride together in the feds and fall under the federal Eme. CHS-4 pointed out guys coming out of the feds often work together to sell dope, even though they had come from different or rival street gangs in New Mexico. CHS-4 identified several Sureños in Albuquerque who were criminally active. CHS-4 said the largest dope plug (supplier) within the Sureños was Echo Park Sureños member JESSE YOUNG, aka: “LOBO.” CHS-4 said YOUNG was not from California, but had very good dope and a lot of it. CHS-4 said YOUNG had a reputation within the gang as a killer.

134. In August 2022, CHS-5 reported the top dope sources of supply within the Sureños were

“LOBO” (JESSE YOUNG) and “DOPEY,” (EDWARD VALLEZ) who distributed together. CHS-5 admitted to selling drugs for LOBO over the past few years. CHS-5 said LOBO was the leader of the Sureños drug ring and DOPEY sold for LOBO and collected drug debts.

135. Within the past 7 days, CHS-5 communicated with YOUNG and VALLEZ and confirmed they had methamphetamine and fentanyl for sale.

136. In August 2022, CHS-6 said Sureños members JESSE YOUNG, aka: “LOBO,” EDWARD VALLEZ, aka: “DOPEY,” were selling at least 100 pounds of methamphetamine and tens of thousands of fentanyl pills per week in Albuquerque. CHS-6 admitted to selling for VALLEZ in the past and knew YOUNG to be sending drugs to Southside Locos in northern New Mexico and to Sureños in Oklahoma. CHS-6 reported YOUNG and VALLEZ were also supplying the WSL because their (WSL’s) source of supply had been hit by the FBI a few months ago. CHS-6 identified WSL members “GRIEFO” (JOSHUA LOZOYA) and “BOOGIE” (ACEN VALADEZ) as being sourced by YOUNG and selling thousands of fentanyl pills each week in Albuquerque.

137. Within the past 7 days, CHS-6 communicated with VALADEZ and LOZOYA and confirmed they had methamphetamine and fentanyl for sale.

138. In August 2022, CHS-8 reported Sureños JESSE YOUNG, aka: “LOBO,” was distributing methamphetamine and fentanyl pills to other Sureños and the Burqueños, which include the WSL. CHS-8 said YOUNG’s top distributors were Sureños members THOMAS JARAMILLO, “CASPER,” EDWARD VALLEZ, “DOPEY,” OMAR MANZANILLA, aka: “SAPO,” and MANZANILLA’s girlfriend “PANDA” (AMANDA CASAUS). CHS-8 said MANZANILLA and CASAUS were also in charge of sending drugs and cellular telephones into MDC and CCCC for the Sureños and their associates.

139. In the past 7 days, CHS-8 communicated with JARAMILLO and MANZANILLA and

confirmed they had methamphetamine for sale.

140. In August 2022, CHS-9 reported JESSE YOUNG, aka: "LOBO," was a member of the Echo Park Sureños and was moving large amounts of dope in Albuquerque. CHS-9 said YOUNG was ~~very~~ paranoid and careful with whom he dealt with. CHS-9 said YOUNG was always armed with a pistol and also had an AR-15 that he often kept in the back of his black pick-up truck. CHS-9 reported YOUNG was being sourced by "paisas" (people from Mexico or Central America), who were cartel.

141. In August 2022, CHS-10 reported JESSE YOUNG, aka: "LOBO," and EDWARD VALLEZ, "DOPEY," were the largest plugs (drug dealers) in Albuquerque right now. CHS-10 said both men were selling indiscriminately to anyone who had money and CHS-10 was surprised law enforcement had not yet hit them. CHS-10 said both men were Sureños, but not from California. CHS-10 said both men carried firearms and had a lot of little homies in Albuquerque on their nuts (willing to support them). CHS-10 admitted to having sold drugs for YOUNG and VALLEZ in the past.

142. Within the past 7 days, CHS-10 communicated with YOUNG and VALLEZ and confirmed they had methamphetamine and fentanyl for sale.

143. In August 2022, CHS-13 reported he previously sold drugs for DAVID CHAVEZ, aka: "WACKY," and BERNARD BACA, aka: "MAD DOG." CHS-13 said CHAVEZ primarily sold dope in the South Valley area of Albuquerque and BACA mostly sold in the Warzone. CHS-13 said both men were obtaining their drugs from the Cubans and Sureños in Albuquerque.

144. In August 2022, CHS-14 reported BERNARD BACA, aka: "MAD DOG," was using and selling methamphetamine from his apartment in Albuquerque. CHS-14 also reported BACA was sending fentanyl, methamphetamine, and Suboxone in to the SNM members at MDC via DAVID

CHAVEZ, aka: "WACKY."

145. Within the past 7 days, CHS-14 communicated with BACA and confirmed he had methamphetamine for sale.

146. In August 2022, CHS-15 reported BERNARD BACA, aka: "MAD DOG," was sending drugs into the SNM pod at MDC. CHS-15 said BACA was being sourced with drugs from the Sureños and the methamphetamine the Sureños supplied was usually 100% pure.

147. In August 2022, CHS-16 reported M.M. was a member of the WSL and SNM. CHS-16 did not know who killed M.M., but said M.M. was always strapped (armed with a gun) and a big dude. CHS-16 said M.M. sold guns, meth, and fentanyl pills. CHS-16 said M.M.'s son "DIABLO" was a WSL member and he also sold guns and drugs. CHS-16 said the top drug distributors within the WSL were ACEN VALADEZ, aka: "BOOGIE," and JOSHUA LOZOYA, aka: "GRIEFO." CHS-16 previously sold drugs with those two men and other WSL members. CHS-16 said the WSL had been getting their fentanyl from WSL member SHAMON PACHECO Jr., aka: "STUNNER," but the feds hit him a couple months ago.<sup>20</sup> CHS 16 said the WSL were now getting their dope from "CASPER," "LOBO," "DOPEY," and "MOUSEY" from the Sureños.<sup>21</sup> CHS-16 said LOBO was the main plug and the others worked for him. CHS-16 identified the aforementioned Sureños by photograph and provided directions to their residences.

148. In August 2022, CHS-17 reported ACEN VALADEZ, aka: "BOOGIE," was selling bulk

---

<sup>20</sup> In April 2022, I obtained 5 federal search warrants for WSL members and associates in Albuquerque involved in armed drug trafficking. Those warrants were executed in April 2022, and FBI agents seized bulk quantities of fentanyl, methamphetamine, and 18 firearms. SHAMON PACHECO, aka: "STUNNER" was one of the targets of that operation and has been charged with federal drug and firearm violations, Case No. 22-CR-896-WJ.

<sup>21</sup> "CASPER" is THOMAS JARAMILLO, "LOBO" is JESSE YOUNG, "DOPEY" is EDWARD VALLEZ, and "MOUSEY" is TIMOTHY CARRERA, who is currently at MDC on state drug trafficking and firearm charges.

quantities of fentanyl pills and methamphetamine to several street level dealers. CHS-17 said VALADEZ was selling from his vehicle and usually drove around town with at least 25-50 boats (one “boat” contains 1,000 fentanyl pills in a Ziplock bag). CHS-17 thought VALADEZ was a law enforcement snitch because he was so brazen with his drug sales and never seemed to get caught. CHS-17 identified VALADEZ by photograph and provided investigators with VALADEZ’ home address in Albuquerque and a description of his vehicles.

149. In August 2022, CHS-18 reported the Sureños had taken over the illicit drug market in Albuquerque and had either outpriced or killed their competitors. CHS-18 said the head of the Sureños drug distribution network was JESSE YOUNG, aka: “LOBO,” who had established a business relationship with cartel representatives in Arizona. CHS-18 said YOUNG received drug shipments every other day that consisted of 50-100 pounds of methamphetamine and as many as 250,000-500,000 fentanyl pills. CHS-18 said YOUNG distributed meth and blues to other Sureños, the WSL, Los Padilla’s gang, black gangs in the Warzone, and the Cubans who ran drug sales within several shady motels around Albuquerque.

150. CHS-18 identified EDWARD VALLEZ, aka: “DOPEY,” and TIMOTHY CARRERA, aka: “MOUSEY,” as YOUNG’s top Sureños drug lieutenants. CHS-18 identified the Sureños members by photograph and pointed out their residences on Google maps.

151. In August 2022, CHS-19 reported WSL members ACEN VALADEZ, aka: “BOOGIE,” and JOSHUA LOZOYA, aka: “GRIEFO,” were selling bulk quantities of fentanyl to younger WSL members and street dealers. CHS-19 said LOZOYA had recently sold fentanyl to a young man who had overdosed and died, and as a result of that incident LOZOYA was worried the cops might be charging him. CHS-19 described VALADEZ’ and LOZOYA’s drug distribution activities and said both men sold tens of thousands of fentanyl pills per week in Albuquerque.

CHS-19 said the WSL members were being supplied fentanyl pills from another gang in Albuquerque, who had connections in Mexico. CHS-19 said the WSL had been getting drugs from SHAMON PACHECO Jr., aka: "STUNNER," who was being sourced by gang members in Arizona; however, the feds arrested PACHECO and his Arizona gang partners in recent months.

152. Within the past 7 days, CHS-19 communicated with VALADEZ and LOZOYA and confirmed they had methamphetamine and fentanyl for sale.

153. In August 2022, CHS-20 reported "LOBO" from the Sureños and "BOOGIE" and "GRIEFO" from the WSL were the top drug suppliers in Albuquerque. The Sureños and WSL were supplying all of the other gangs, motels, and drug houses in the Warzone (Southeast Albuquerque).

154. CHS-20 said Sureños members "CASPER" (THOMAS JARAMILLO) sold methamphetamine and fentanyl for the Sureños. CHS-20 identified JARAMILLO from photographs and provided directions to his residence.

155. CHS-20 said a female named "LOVELY LOKKA" (SABRINA ADAMS) was well known in Albuquerque and obtained drugs from the Sureños and WSL. CHS-20 admitted to previously purchasing drugs from AMANDA CASAUS, aka: "PANDA," and ADAMS in the past. CHS-20 said both women usually had several firearms in their residences because they would accept them as payment for drugs. CHS-20 said most of the guns were stolen, as meth and fentanyl addicts broke into cars and often came across guns. The addicts would then bring the guns to CASAUS or ADAMS and trade for dope. CASAUS and ADAMS would trade 250 blues (fentanyl pills) for each working gun.<sup>22</sup>

156. CHS-20 reported Sureños member OMAR MANZANILLA, aka: "SAPO," was living with

---

<sup>22</sup> ADAMS and CASAUS have several photos on social media posts in which they are posing with different pistols and rifles.

AMANDA CASAUS and protecting her business. CHS-20 said a lot of meth and fentanyl addicts would bring stolen stuff to CASAUS and try and rip her off for dope. MANZANILLA was always armed and protected the property and chased people off who stayed too long or didn't have money for drugs.

157. Within the past 7 days, CHS-20 communicated with CASAUS and ADAMS and confirmed they had methamphetamine and fentanyl for sale.

158. In August 2022, CHS-21 reported "LOBO" (JESSE YOUNG) and "DOPEY" (EDWARD VALLEZ) were distributing hundreds of pounds of methamphetamine and tens of thousands of fentanyl pills per month in Albuquerque. CHS-21 identified YOUNG and VALLEZ by photograph and provided directions to their home addresses. CHS-21 described the inner workings of YOUNG's and VALLEZ' drug distribution network and said they were being sourced by cartel members in Arizona. Within the past 7 days, CHS-21 communicated with YOUNG and confirmed he had methamphetamine and fentanyl for sale.

159. In August 2022, CHS-22 reported JESSE YOUNG, aka: "LOBO," was selling drugs from Subject Premises A-2. CHS-22 reported YOUNG was storing bulk cash at the Subject Premises. CHS-22 had seen several hundred thousand dollars in cash in a duffle bag at the Subject Premises in recent weeks. CHS-22 said YOUNG had lived at Subject Premises A-2 for about a year with his girlfriend. CHS-22 said YOUNG and his girlfriend lived inside structure B, which is located on the northern part of the property, and stored miscellaneous items in structure A, which is located on the eastern part of the property. According to CHS-22, a male subject rented structure C and all of that person's property was enclosed within a fence that surrounded structure C. CHS-22 described several different buildings and features at Subject Premises A-2.

160. All of the CHS mentioned in the preceding paragraphs said the Target Subjects utilize cellular telephones to communicate with one another, their sources of supply, and their drug clientele.

**Distribution in the Jails and Prisons**

161. In August 2022, CHS-13 reported “PANDA” (AMANDA CASAUS) and “SAPO,” (OMAR MANZANILLA) were sending drugs into numerous inmates at MDC via fake legal mail.<sup>23</sup> CHS-13 said SAPO was carrying a clavo (drugs) on his person in case he was arrested on his state PV warrants. SAPO would then bring the drugs into MDC via a body cavity. CHS-13 had PANDA send drugs to two inmates at MDC in the past few months. CHS-13 said PANDA might have a dirty staff member bringing the dope in because she was so consistent with her deliveries.

162. In August 2022, CHS-15 reported SNM members DAVID CHAVEZ, aka: “WACKY,” MARIO CHAVEZ, aka: “LITTLE MAN,” RAYMOND SALAS, aka: “RAY RAY,” ENRIQUE ROYBAL, aka: “SLEEPY,” and ERNEST GUERRO, aka: “ERN DOG,” were selling heroin, fentanyl, and Suboxone at MDC. CHS-15 said all five men were in the same pod at MDC and receiving drug packages from a female that goes by the name “AMANDA PANDA BEAR” (AMANDA CASAUS). CHS-15 said the packages were sent into MDC every other week via legal mail. CHS-15 said DAVID CHAVEZ had the connection to CASAUS.

163. CHS-15 said PANDA and a female known as “LOVELY LOKKA” (SABRINA ADAMS) were sending drugs and miniature cellular telephones to inmates at the CCCC facility in Milan,

---

<sup>23</sup> I provided MDC STIU officers with CASAUS’ telephone number and requested they check to see if any inmates were speaking with CASAUS. STIU officers located numerous telephone calls in which CASAUS and inmates discussed drug deals, sending drugs into MDC, the location of concealed firearms in vehicles or residences, and drug debts owed to CASAUS. During some of the calls OMAR MANZANILLA, aka: “SAPO,” who was clearly with CASAUS, got on the phone and talked to inmates.

New Mexico. CHS-15 said the Burqueño pods at CCCC were currently being run by WSL members and an undercover SNM member was in the pod.<sup>24</sup> CHS-15 spoke with the undercover SNM member and learned the Burqueños pods were getting dope in on a weekly basis. The undercover SNM member requested CHS-15 obtain some methamphetamine and fentanyl and provide them to PANDA or LOVELY LOKKA. The undercover SNM member provided CHS-15 with the social media contact information for both women, which confirmed PANDA to be AMANDA CASAUS and LOVELY LOKKA to be SABRINA ADAMS.

164. CHS-15 subsequently contacted both woman and they told CHS-15 to provide them with dope and they would get it into CCCC.

165. In August 2022, CHS-20 reported “PANDA” (AMANDA CASAUS) and “LOVELY LOKKA” (SABRINA ADAMS) were the best people for sending drugs and small cell phones into jail facilities. CHS-20 said both women had legal stationary and red stamps labeled “Legal Mail” that they utilized to send drugs into inmates at MDC, CCCC, and the NMCD. CHS-20 also knew both women to employ people to throw packages containing drugs and cell phones over the fence at CCCC, which were then collected by inmates and sold within the facility.

166. I am aware CCCC has had a serious drug problem within the facility for several months now. In fact, officers recently recovered an entire pound of methamphetamine from within an inmate’s jail cell.

167. This affidavit is being submitted for 15 search warrants to aid the FBI and DEA in thwarting racketeering activity, to include violent crime and drug trafficking activities by the SNM, Sureños, and WSL. As with past gang investigations, I anticipate recovering numerous firearms

---

<sup>24</sup> The reference to an undercover SNM member means the member is not claiming to be from the SNM, nor is he displaying any SNM tattoos. SNM members sometimes employ this technique to get closer to a rival or score dope more easily.

from the Subject Premises and pray one of more of the firearms were those utilized in the recent murders of two SNM members in Albuquerque.

168. In the pages that follow, I have sought to identify the Target Subjects in greater detail, noted whether they are suspected members of any gangs, and described their roles in the Target Offenses. I have included the arrest history of the Target Subjects, and where possible, noted the offenses for which they were convicted.

### **THE TARGET SUBJECTS**

169. **Target Subject 1** JESSE YOUNG, aka: “LOBO,” is a Sureños member and has at least 21 prior arrests in New Mexico. YOUNG has felony convictions for possession of a controlled substance (x2) and receiving or transferring a stolen motor vehicle (x3). YOUNG is currently on state probation in three separate matters, and arrest warrants were issued in all three cases on July 29, 2021. Those warrants remain active with nationwide extradition, Case Numbers D-202-CR-2017-00756, D-202-CR-2017-01098, and D-202-CR-2017-03043.

170. **Target Subject 2** THOMAS JARAMILLO, aka: “CASPER,” is a Sureños member and has at least 5 prior arrests in New Mexico and four prior arrests in Utah. JARAMILLO has felony convictions for trafficking a controlled substance (x2) and attempt to possess cocaine.

171. **Target Subject 3** EDWARD VALLEZ, aka: “DOPEY,” is a Sureños member and has at least 26 prior arrests in New Mexico. VALLEZ has felony convictions for aggravated burglary with a deadly weapon (x4), aggravated fleeing a law enforcement officer (x4), aggravated assault with a deadly weapon, cruelty to animals, being a convicted felon in possession of a firearm, and trafficking a controlled substance (x4). VALLEZ is currently on state probation for aggravated burglary with a deadly weapon and aggravated fleeing a law enforcement officer.

172. **Target Subject 4** JOSHUA LOZOYA, aka: “GRIEFO,” is a WSL member and has at least

7 prior arrests in New Mexico. LOZOYA has a felony conviction for possession of a controlled substance. LOZOYA is currently wanted on an APD warrant for trafficking heroin, Case No. T-4-FR-2019-000414 with statewide extradition.

173. **Target Subject 5** ACEN VALADEZ, aka: "BOOGIE," is a WSL member and has at least 8 prior arrests in New Mexico. VALADEZ has two felony convictions for trafficking a controlled substance and a misdemeanor domestic violence conviction for battery. VALADEZ is currently being sought on a misdemeanor Bernalillo County arrest warrant for failure to appear, original charge of animal mistreatment, Case No. T-4-CR-2021-001019.

174. **Target Subject 6** SABRINA ADAMS, aka: "LOVELY LOKKA," is a gang associate and has at least 4 prior arrests in New Mexico and no convictions. ADAMS is currently being sought on a Bernalillo County misdemeanor arrest warrant for failure to appear, original charge of speeding.

175. **Target Subject 7** AMANDA CASAUS, aka: "PANDA," is a gang associate and has at least 26 prior arrests in New Mexico and one in Nevada. CASAUS has felony convictions for trafficking a controlled substance (x3), receiving or transferring a stolen motor vehicle (x8), possession of a controlled substance (x3) and unlawful taking of a motor vehicle.

176. **Target Subject 8** OMAR MANZANILLA, aka: "SAPO," is a Sureños member and has at least 20 prior arrests in New Mexico. MANZANILLA has felony convictions for possession of a controlled substance (x2), receiving or transferring a stolen motor vehicle (x3), reckless driving, and fraudulent use of a credit card. MANZANILLA is currently on state probation in three separate matters and arrest warrants were issued in all three cases on July 20, 2021. Those warrants remain active with nationwide extradition, Case Numbers D-202-CR-2019-01380, D-202-CR-2019-01311, and D-202-CR-2019-02151. MANZANILLA also has an active Valencia County Sheriff's

Office felony warrant, with nationwide extradition, for aggravated fleeing a law enforcement officer, aggravated assault with a deadly weapon (x2), unlawful taking of a motor vehicle, child abuse, battery, tampering with evidence, and being a felon in possession of a firearm, Case No. D-1314-CR-202100213.

177. **Target Subject 9:** BERNARD BACA, aka “MAD DOG,” is an SNM member and has at least 24 prior arrests in New Mexico. BACA has felony convictions for being a felon in possession of a firearm, altering or making a fictitious driver’s license, unlawful taking of a motor vehicle and forgery. BACA is currently serving a term of supervised release under the supervision of the USPO in Albuquerque for being a felon in possession of a firearm, Case No. 19-CR-03053-JAP.

178. **Target Subject 10** ERIC HARRISON, aka: “SNOOPS,” is an SNM member and has at least 38 prior arrests in New Mexico. HARRISON has felony convictions for possession with intent to distribute methamphetamine, possession of a firearm in furtherance of a drug trafficking crime, trafficking a controlled substance, criminal damage to property (x2), residential burglary (x2), and receiving or transferring a stolen vehicle (x2). HARRISON is currently serving a term of supervised release under the supervision of the USPO in Albuquerque for possession with intent to distribute methamphetamine, possession of a firearm in furtherance of a drug trafficking crime, Case No. 15-CR-04272-JB. HARRISON was recently released from the BOP and is currently residing at the Diersen Charities halfway house in Albuquerque.

179. **Target Subject 11** DAVID CHAVEZ, aka: “WACKY,” is an SNM member and has at least 29 prior arrests in New Mexico. CHAVEZ has prior felony convictions for first degree murder, shooting from or at a motor vehicle, conspiracy to commit aggravated assault, possession with intent to distribute cocaine base, possession of a firearm in furtherance of a drug trafficking crime and being a felon in possession of a firearm. CHAVEZ is currently in custody on local

charges and being housed within the SNM pod at MDC. The FBI placed a federal hold on CHAVEZ in relation to a pending felon in possession of a firearm case. Upon his release from MDC, FBI agents will pick him up and take him to federal court for his initial appearance.

180. **Target Subject 12** MARIO CHAVEZ, aka: "LITTLE MAN," is an SNM member and has at least 16 prior arrests in New Mexico. CHAVEZ has felony convictions for residential burglary, aggravated assault with a deadly weapon (x2), false imprisonment, conspiracy, and aggravated burglary (x2). CHAVEZ is currently in custody on local charges and being housed within the SNM pod at MDC.

181. **Target Subject 13** RAYMOND SALAS, aka: "RAY RAY," is an SNM member and has at least 41 prior arrests in New Mexico. SALAS has felony convictions for aggravated assault with a deadly weapon, tampering with evidence, breaking and entering, burglary (x6), and larceny. SALAS is currently in custody on local charges and being housed within the SNM pod at MDC.

182. **Target Subject 14** ENRIQUE ROYBAL, aka: "SLEEPY," is an SNM member and has at least 20 prior arrests in New Mexico. ROYBAL has felony convictions for possess deadly weapon by a prisoner, tampering with evidence, receiving or transferring a stolen motor vehicle, possession of a controlled substance, auto theft (x2), and criminal damage to property. ROYBAL is currently in custody on local charges and being housed within the SNM pod at MDC.

183. **Target Subject 15** ERNEST GUERRO, aka: "ERN DOG", is an SNM member and has at least 21 prior arrests in New Mexico. GUERRO has felony convictions for aggravated burglary (x7), conspiracy to commit aggravated burglary, being a felon in possession of a firearm, possession of a deadly weapon by a prisoner (x2), tampering with evidence, aggravated battery (x3), conspiracy to commit a crime (x3) and aggravated battery with a deadly weapon. GUERRO is currently in custody on local charges and being housed within the SNM pod at MDC.

### **THE SUBJECT PREMISES**

184. **Subject Premises A-1:** I believe JESSE YOUNG, aka: "LOBO," lives on a part time basis at Subject Premises A-1, located at 3123A Leo Road SW, Albuquerque, New Mexico, 87105. Subject Premises A-1 is described as a single story residence, with pink siding and white trim. There are several disabled cars parked in front of the house and the numbers 3123A are posted on a gray mailbox in front of the residence. There is a white metal security door over the front door. A color photograph of the Subject Premises has been attached and incorporated in Attachment A.

#### **Indicia of Residence**

- a) YOUNG is on state probation, and the Subject Premises is his residence of record with NMCD.
- b) YOUNG's valid New Mexico driver's license lists the Subject Premises as his residence.
- c) Citizen informants who reside in the area said YOUNG comes to the house late at night to visit his children, who live at the Subject Premises.
- d) CHS-5 said YOUNG stores money at the Subject Premises and comes by in the evenings to see his family.

185. **Subject Premises A-2:** I believe JESSE YOUNG, aka: "LOBO," lives at Subject Premises A-2, located at 1435 Atrisco Drive SW, units A and B, Albuquerque, New Mexico, 87105.<sup>25</sup> Subject Premises A-2 is described as a single plot of land that has three residences on it: "A," "B," and "C." All three residences have brown siding, white trim, and a silver colored metal roof. There

---

<sup>25</sup> The property on which Subject Premises A-2 is located is owned by YOUNG's girlfriend, according to county records. There are three houses located on the property, designated A, B, and C. The property is contained on all sides by a fence. FBI and DEA case agents believe YOUNG occupies units A and B. A third party rents unit C, which is contained by an inner fence that encloses unit C and a small yard around it. To better illustrate this, I have included several color photos within Attachment A, which has been attached hereto and incorporated herein by this reference.

are multiple sheds and out buildings on the property. The numbers 1435A, 1435B, and 1435C are posted on mailboxes to the east of the Subject Premises and the letter "b" is painted in blue on a metal gate at the southern entrance to the Subject Premises. There are video cameras posted all over the exterior of the property. Agents will be searching the A and B residences, and the vehicles and curtilage around those buildings. A large pole can be seen in the center of the property with several cameras mounted on the pole. Color photographs of the Subject Premises have been attached and incorporated in Attachment A.

Indicia of Residence

- a) Surveillance agents have observed YOUNG arrive and depart the location in a large black pick-up truck.
- b) YOUNG's girlfriend owns the property upon which Subject Premises A-2 is located.
- c) CHS-3 spoke with YOUNG and YOUNG said he is staying in a "Trap House" off Isleta because he has warrants.
- d) CHS-21 and CHS-22 have visited YOUNG at the Subject Premises and both said YOUNG lives there.

186. **Subject Premises A-3:** I believe THOMAS JARAMILLO, aka: "CASPER," lives at Subject Premises A-3, located at 3810 Villa Serena Place SW, Albuquerque, New Mexico, 87121. Subject Premises A-3 is described as a single story residence with white siding and green trim. There are cameras positioned on all sides of the residence. The numbers 3810 are posted on the front of the residence, near the driveway. A color photograph of the Subject Premises has been attached and incorporated in Attachment A.

Indicia of Residence

- a) JARAMILLO's valid New Mexico driver's license lists the Subject Premises as his address.
- b) Several vehicles are parked at the Subject Premises that are registered to JARAMILLO.
- c) Law enforcement databases list the Subject Premises as JARAMILLO's residence.
- d) CHS-3 and CHS-8 reported JARAMILLO lives at the Subject Premises.
- e) Surveillance agents have observed JARAMILLO enter and exit the residence.

187. **Subject Premises A-4:** I believe EDWARD VALLEZ, aka: "DOPEY," lives at Subject Premises A-4, located at 1114 ½ Sunflower Road SW, Albuquerque, New Mexico, 87105. Subject Premises A-4 is described as a single story residence with tan siding and brown trim. There are multiple cameras positioned around the Subject Premises. The numbers 1114 ½ are posted on the mailbox in front of the residence. The Subject Premises is located behind 1114 Sunflower Road SW, Albuquerque. A color photograph of the Subject Premises has been attached and incorporated in Attachment A.

Indicia of Residence

- a) VALLEZ is on state probation, and the Subject Premises is his residence of record with NMCD.
- b) VALLEZ' valid New Mexico driver's license lists the Subject Premises as his residence.
- c) Law enforcement records indicate VALLEZ lives at the Subject Premises.
- d) VALLEZ received unemployment benefits and listed the Subject Premises as his residence.

- e) Surveillance agents have observed VALLEZ enter and exit the residence.
- f) CHS-3, CHS-5, and CHS-10 reported VALLEZ lives at the Subject Premises.

188. **Subject Premises A-5:** I believe JOSHUA LOZOYA, aka: "GRIEFO," lives at Subject Premises A-5, located at 10416 Connemara Drive SW, Albuquerque, New Mexico, 87121. Subject Premises A-5 is described as a single story residence with red brick siding and light blue trim. There are multiple cameras positioned around the Subject Premises. The numbers 10416 are posted on the curb in front of the residence and on the front of the house next to the garage door. A color photograph of the Subject Premises has been attached and incorporated in Attachment A.

Indicia of Residence

- a) LOZOYA's valid New Mexico driver's license lists the Subject Premises as his residence.
- b) LOZOYA's black Audi 2.0T sedan is parked in the driveway of the Subject Premises on a near daily basis. The vehicle is registered to LOZOYA at the Subject Premises.
- c) Law enforcement records indicate VALLEZ lives at the Subject Premises.
- d) LOZOYA received unemployment benefits and listed the Subject Premises as his residence.
- e) LOZOYA has an active Bernalillo County arrest warrant and the warrant lists the Subject Premises as his residence (T-4-FR-2019-00414).

189. **Subject Premises A-6:** I believe ACEN VALADEZ, aka: "BOOGIE," lives at Subject Premises A-6, located at 1340 Tres Ritos Street SW, Albuquerque, New Mexico, 87121. Subject Premises A-6 is described as a two story residence with light tan stucco siding and brown trim. There are multiple cameras positioned around the Subject Premises. The numbers 1340 are posted

on the front of the house next to the garage door. A color photograph of the Subject Premises has been attached and incorporated in Attachment A.

Indicia of Residence

- a) VALADEZ's valid New Mexico driver's license lists the Subject Premises as his residence.
- b) VALADEZ owns Valadez Towing and listed the Subject Premises as his address on the business license. The tow truck is often parked on the street outside the Subject Premises.
- c) VALADEZ' silver Dodge Durango (NM: UNM37048) and gray Cadillac Escalade (NM: BHWZ24) are parked at the Subject Premises on a near daily basis and are registered to VALADEZ at the Subject Premises.
- d) Law enforcement records indicate VALLEZ lives at the Subject Premises.
- e) VALADEZ has an active Bernalillo County arrest warrant and the warrant lists the Subject Premises as his residence (T-4-CR-2021-001019).

190. **Subject Premises A-7:** I believe SABRINA ADAMS, aka: "LOVELY LOKKA," lives at Subject Premises A-7, located at 1132 Florida Street SE, unit E, Albuquerque, New Mexico, 87108. Subject Premises A-7 is described as a single story apartment complex with red brick siding and white trim. There are multiple cameras positioned around the Subject Premises. The numbers 1132 are posted on the west side of the apartment building and the letter E is posted on the white front door of the Subject Premises. A color photograph of the Subject Premises has been attached and incorporated in Attachment A.

Indicia of Residence

- a) ADAMS' vehicle, 2004 red Saturn (NM: BDTY57) is registered to ADAMS at the Subject Premises.
- b) Law enforcement records list the Subject Premises as ADAMS residence.
- c) ADAMS has an active Bernalillo County arrest warrant and the warrant lists the Subject Premises as ADAMS residence (T-4-TR-2021-007832)
- d) Surveillance agents have observed ADAMS enter and exit the residence.
- e) CHS-19 and CHS-20 reported ADAMS lives at the Subject Premises.

191. **Subject Premises A-8:** I believe AMANDA CASAUS, aka: "PANDA," and OMAR MANZANILLA, aka: "SAPO," live at Subject Premises A-8, located at 1322 Vito Romero Road SW, Albuquerque, New Mexico, 87105. Subject Premises A-8 is described as a single story residence with red brick and white siding. There are multiple cameras positioned around the Subject Premises. The numbers 1322 are posted on a black mailbox at the entrance the driveway. A color photograph of the Subject Premises has been attached and incorporated in Attachment A.

Indicia of Residence

- a) CASAUS' valid New Mexico driver's license lists the Subject Premises as her residence.
- b) CASAUS' 2012 silver Cadillac CTS (NM: 564WSC) is registered to CASAUS at the Subject Premises.
- c) CASAUS recently discharged state probation and listed the Subject Premises as her residence of record with the NMCD.
- d) Law enforcement records list the Subject Premises as CASAUS' residence.
- e) MANZANILLA's valid New Mexico driver's license lists the Subject Premises as his residence.

- f) Surveillance agents have observed CASAUS and MANZANILLA enter and exit the residence.
- g) CHS-19 and CHS-20 reported CASAUS and MANZANILLA live at the Subject Premises.

192. **Subject Premises A-9:** I believe BERNARD BACA, aka: "MAD DOG," lives at Subject Premises A-9, located at 2901 Euclid Avenue NE, apartment 22-B, Albuquerque, New Mexico, 87106. Subject Premises A-9 is described as a two story apartment complex with tan siding and white and gray trim. The name of the Apartment Complex is Sandia Shadows and the address is posted on the front of the building. The numbers 22-B are posted on the white front door of the Subject Premises. A color photograph of the Subject Premises has been attached and incorporated in Attachment A.

Indicia of Residence

- f) BACA is on federal probation, and the Subject Premises is his residence of record with USPO.
- g) Surveillance agents have observed BACA enter and exit the residence.
- h) CHS-13 and CHS-15 reported BACA lives at the Subject Premises.

193. **Subject Premises A-10:** I am aware ERIC HARRISONS, aka: "SNOOP," lives in the men's dormitory at the Diersen Charities halfway house (Subject Premises A-10), located at 2331 Menaul Boulevard NE, Albuquerque, New Mexico, 87107. FBI agents will request Diersen staff point out the bed/sleeping area, closet, storage container(s), locker(s), shelves, drawers, or other spaces designated for use by HARRISON, and agents will search those areas.

**Subject Premises A-11:** I am aware DAVID CHAVEZ, aka: "WACKY," is an inmate at MDC and is being housed in the Restricted Housing Unit 2, cell 12. MDC STIU officers will escort

and assist FBI agents in the search of Subject Premises A-11. The search will be conducted in a manner consistent with MDC policy and safety protocols.

194. **Subject Premises A-12:** I am aware MARIO CHAVEZ, aka: "LITTLE MAN," is an inmate at MDC and is being housed in the Restricted Housing Unit 2, cell 29 with Target Subject ENRIQUE ROYBAL, aka: "SLEEPY." MDC STIU officers will escort and assist FBI agents in the search of Subject Premises A-12. The search will be conducted in a manner consistent with MDC policy and safety protocols.

195. **Subject Premises A-13:** I am aware RAYMOND SALAS, aka: "RAY RAY," is an inmate at MDC and is being housed in the Restricted Housing Unit 2, cell 27. MDC STIU officers will escort and assist FBI agents in the search of Subject Premises A-13. The search will be conducted in a manner consistent with MDC policy and safety protocols.

196. **Subject Premises A-14:** I am aware ENRIQUE ROYBAL, aka: "SLEEPY," is an inmate at MDC and is being housed in the Restricted Housing Unit 2, cell 29 with target Subject MARIO CHAVEZ, aka: "LITTLE MAN." MDC STIU officers will escort and assist FBI agents in the search of Subject Premises A-14. The search will be conducted in a manner consistent with MDC policy and safety protocols.

197. **Subject Premises A-15:** I am aware ERNEST GUERRO, aka: "ERN DOG," is an inmate at MDC and is being housed in the Restricted Housing Unit 2, cell 5. MDC STIU officers will escort and assist FBI agents in the search of Subject Premises A-15. The search will be conducted in a manner consistent with MDC policy and safety protocols.

#### **Search Limitations**

198. The search of the Subject Premises A-1 through A-9 (the residences) shall include the entire residences and all outbuildings, trash cans, and storage containers designated for use by the

respective Subject Premises. The search shall also include vehicles parked at, or in front of, the Subject Premises provided such vehicle(s) has an apparent connection to the Subject Premises. Connection to the Subject Premises may be established by way of prior law enforcement observation, vehicle registration, subject admission or possession of an ignition key.

199. The search of Subject Premises A-10 (Diersen Charities) shall include the bed/sleeping area, closet(s), locker(s), shelves, drawers, or other storage container(s) designated for use by ERIC HARRISON, aka: "SNOOP." FBI agents executing the search warrant will request Diersen Charities staff assist agents in pointing out which bed/sleeping area, closet(s), locker(s), shelves, drawers, or other storage container(s) belong to HARRISON.

200. The search of Subject Premises A-11 through A-15 (MDC jail) will be coordinated with MDC STIU gang officers and executed pursuant to MDC policies and safety protocols.

**SEARCHING FOR GANG TATTOOS:**

201. When the search warrants are executed, agents will attempt to interview the Target Subjects about their gang membership. I believe gang tattoos to be significant evidence of gang affiliation and such tattoos may constitute an overt act, in-so-much-as gang-specific tattoos enable a person to maintain or increase their position within the gang. I have successfully charged multiple gang members with overt acts, within the context of a RICO conspiracy, for having one or more gang specific tattoos.

202. It has been my experience that many people lie when speaking with law enforcement and will sometimes go to great lengths to conceal their gang ties. Furthermore, the persons to be searched may exercise their constitutional right to refrain from speaking with law enforcement agents. In an effort to discern and document the Target Subject's gang affiliation, I am requesting law enforcement agents be permitted to search the bodies of the male Target Subjects, above the

waist and below the thighs, for tattoos.

203. I am aware that the SNM, Sureños, and WSL often have distinct tattoos that represent their dedication to their respective criminal enterprises. Members display these tattoos to gain respect within the enterprise and to intimidate non-members. I am seeking the court's permission to utilize law enforcement photographers to photograph and document the Target Subject's tattoos. Such photo documentation would help positively identify subjects and better document and determine their gang affiliation.

204. Law enforcement and corrections department records that I have reviewed in this case indicate that all of the male Target Subjects have one or more tattoos on their bodies. I believe the male Target Subjects may have gang related tattoos.

205. **EXHIBIT 1**, which is attached hereto and incorporated herein, contains several examples of SNM, Sureños, and WSL gang tattoos.

#### **BIOMETRIC ACCESS TO DEVICES**

206. I know from my training and experience, as well as from information found in publicly available materials published by device manufacturers, that many electronic devices, particularly newer mobile devices, offer their users the ability to unlock the device through biometric features in lieu of a numeric or alphanumeric passcode or password. These biometric features include fingerprint scanners, facial recognition features and iris recognition features. Some devices offer a combination of these biometric features, and the user of such devices can select which features they would like to utilize.

207. If a device is equipped with a fingerprint scanner, a user may enable the ability to unlock the device through his or her fingerprints. For example, Apple offers a feature called "Touch ID," which allows a user to register up to five fingerprints that can unlock a device. Once a fingerprint

is registered, a user can unlock the device by pressing the relevant finger to the device's Touch ID sensor, which is found in the round button (often referred to as the "home" button) located at the bottom center of the front of the device. The fingerprint sensors found on devices produced by other manufacturers have different names but operate similarly to Touch ID.

208. If a device is equipped with a facial-recognition feature, a user may enable the ability to unlock the device through his or her face. For example, this feature is available on certain Android devices and is called "Trusted Face." During the Trusted Face registration process, the user holds the device in front of his or her face. The device's front-facing camera then analyzes and records data based on the user's facial characteristics. The device can then be unlocked if the front-facing camera detects a face with characteristics that match those of the registered face. Facial recognition features found on devices produced by other manufacturers have different names but operate similarly to Trusted Face.

209. If a device is equipped with an iris-recognition feature, a user may enable the ability to unlock the device with his or her irises. For example, on certain Microsoft devices, this feature is called "Windows Hello." During the Windows Hello registration, a user registers his or her irises by holding the device in front of his or her face. The device then directs an infrared light toward the user's face and activates an infrared-sensitive camera to record data based on patterns within the user's irises. The device can then be unlocked if the infrared-sensitive camera detects the registered irises. Iris-recognition features found on devices produced by other manufacturers have different names but operate similarly to Windows Hello.

210. In my training and experience, users of electronic devices often enable the aforementioned biometric features because they are considered to be a more convenient way to unlock a device than by entering a numeric or alphanumeric passcode or password. Moreover, in some instances,

biometric features are considered to be a more secure way to protect a device's contents. This is particularly true when the users of a device are engaged in criminal activities and thus have a heightened concern about securing the contents of a device.

211. As discussed in this Affidavit, I have reason to believe that one or more digital devices will be found during the search. The passcode or password that would unlock the devices subject to search under this warrant currently is not known to law enforcement. Thus, law enforcement personnel may not otherwise be able to access the data contained within the devices, making the use of biometric features necessary to the execution of the search authorized by this warrant.

212. I also know from my training and experience, as well as from information found in publicly available materials including those published by device manufacturers, that biometric features will not unlock a device in some circumstances even if such features are enabled. This can occur when a device has been restarted, is inactive, or has not been unlocked for a certain period of time. For example, Apple devices cannot be unlocked using Touch ID when: (1) more than 48 hours has elapsed since the device was last unlocked; or, (2) when the device has not been unlocked using a fingerprint for 8 hours *and* the passcode or password has not been entered in the last 6 days. Similarly, certain Android devices cannot be unlocked with Trusted Face if the device has remained inactive for four hours. Biometric features from other brands carry similar restrictions. Thus, in the event law enforcement personnel encounter a locked device equipped with biometric features, the opportunity to unlock the device may exist for only a short time.

213. Due to the foregoing, if law enforcement personnel encounter any devices that are subject to seizure pursuant to this warrant and may be unlocked using one of the aforementioned biometric features, I request permission to: (1) press or swipe the fingers (including thumbs) of the Target Subjects to the fingerprint scanner of the devices found at the Subject Premises; (2) hold the

devices found at the Subject Premises in front of the face of the Target Subjects and activate the facial recognition feature; and/or (3) hold the devices found at the Subject Premises in front of the face of the Target Subjects and activate the iris recognition feature, for the purpose of attempting to unlock the devices in order to search the contents as authorized by this warrant. The proposed warrant does not authorize law enforcement to request that the Target Subjects state or otherwise provide the password or any other means that may be used to unlock or access the devices. Moreover, the proposed warrant does not authorize law enforcement to ask the Target Subjects to identify the specific biometric characteristics (including the unique finger(s) or other physical features) that may be used to unlock or access the devices.

**REQUEST FOR NIGHT TIME SERVICE:**

214. I am requesting the Court authorize the FBI to serve these warrants prior to 6:00 a.m., as set forth under Fed. R. Crim. Proc. 41(e) (2) (A) (ii). Agents and officers will be attempting to serve the requested search warrants in closely coordinated and simultaneous raids. FBI SWAT teams have been briefed on this operation and will be utilized to execute the search warrants. I am requesting the Court authorize the FBI to serve the requested search warrants for a number of factors:

- a) the search warrants will need to be executed in a closely coordinated and simultaneous sequence;
- b) the locations and persons to be searched are located in different parts of the city;
- c) many of the Subject Premises are believed to be equipped with cameras;
- d) firearms are believed to be present at the subject's residences;
- e) the majority of the Target Subjects have extensive criminal histories.
- f) many of the Subject Premises are located near schools and/or school bus stops and

I would like to avoid school-age children congregating around bus stops or otherwise traveling toward schools. I believe many of the schools in the targeted areas start as early as 7:20 a.m.

215. Therefore, I am requesting authorization to serve the requested search warrants at any time of the day or night.

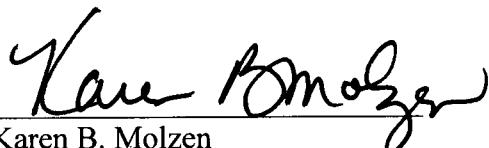
**CONCLUSION:**

216. Based on the foregoing, I believe that there is probable cause to believe that evidence of violations of 18 U.S.C. §§ 1962, 1959, 924(c), 922(g), and 21 U.S.C. §§ 841(a), 843(b), 846 and 856, as more particularly described in Attachment B will be found at the Subject Premises and on the Target Subjects. Therefore, I submit that this affidavit supports probable cause for warrants to search the premises described in Attachment A and seize the items described in Attachment B. This affidavit was reviewed by Assistant United States Attorneys Maria Armijo, Randy Castellano, and Ryan Ellison of the District of New Mexico.

Respectfully submitted,

  
\_\_\_\_\_  
Bryan Acee  
FBI Special Agent

Electronically submitted and ~~telephonically~~ sworn to me on August 25, 2022.

  
Karen B. Molzen  
United States Magistrate Judge  
District of New Mexico

*in person*  
KBM

Attachment: **EXHIBIT 1**, containing relevant sample gang tattoos.

**EXHIBIT 1**

**EXAMPLE GANG TATTOOS**

**SNM**



**SUREÑOS**



**WEST SIDE LOCOS**

